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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation: CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch,

On May 11, 2017, Sherri Turpin, Chief Executive Officer; Michael Flanagan, Chief Financial Officer; and Gregory Hlibok, Chief Legal Officer for ZVRS Holding Company (“ZVRS Holding”), parent company of CSDVRS, LLC d/b/a ZVRS (“ZVRS”) and Purple Communications, Inc. (“Purple”), along with their outside counsel Jennifer Richter and Gregory Simon, and former Commissioner Harold Furchtgott-Roth met with Chairman Pai and his Legal Advisor, Zenji Nakazawa, to discuss the Further Notice of Proposed Rulemaking in the above-referenced proceedings.¹

The companies thanked Chairman Pai for taking meaningful steps in his first 100 days as Chairman to prioritize video relay service (“VRS”) with a focus on improving the quality and efficiency of the service in order to ensure that the Community has access to functionally equivalent service.² ZVRS and Purple appreciate the Commission’s efforts in this proceeding and are excited to partner with the Commission as, as Furchtgott-Roth put it, a good citizen company that will move VRS and all technologies forward for the Community.

¹ *Structure and Practices of the VRS Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd. 2436 (Mar. 23, 2017) (the Further Notice of Proposed Rulemaking, individually, the “FNPRM”).

² See Remarks of FCC Chairman Ajit Pai at the American Enterprise Institute, “The First 100 Days: Bringing the Benefits of the Digital Age to All Americans,” Washington, D.C., (May 5, 2017), *available at* https://apps.fcc.gov/edocs_public/attachmatch/DOC-344733A1.pdf. In his remarks, Chairman Pai stated:

“Another area where this FCC has made a mark is in ensuring that communications services are accessible to Americans with disabilities. For instance, we’ve taken steps to improve the quality and efficiency of video relay services—services that help people who are deaf, hard-of-hearing, and speech disabled. Our reforms will encourage more competition and help make these services more useful to disabled Americans in their daily lives.”

Id. at 5.

In the meeting, ZVRS and Purple reiterated that the joint rate proposal filed by the non-dominant VRS providers³ is the most viable proposal to advance the Commission's goals for VRS and the TRS Fund ("Fund").⁴ It is also the only proposal that brings rates closer to costs for small, medium and large size providers. Turpin emphasized that it is critical for the Commission to maintain the proposed rates for four years and apply them retroactive to January 1, 2017 in order to stabilize the non-dominant VRS providers who have been devastated by declining rates under the glide path.

Furchtgott-Roth agreed that the joint rate proposal is the most sensible option at this juncture and explained why maintaining a tiered rate structure for VRS makes sense given the current state of the market. Moving to a unitary rate at this time would result in one of two possible outcomes. If the rate is set too high, providers would be overpaid from the Fund. If the rate is set too low, only one or two providers will remain in the market. Furchtgott-Roth explained that the joint rate proposal will bring stability to the market.

Turpin explained that ZVRS and Purple are working to bridge two worlds by bringing technology to the Deaf and Hard of Hearing community ("Community") and companies that seek to employ Deaf and Hard of Hearing individuals. Turpin discussed her Community-first approach, and that she has surrounded herself with Deaf and Hard of Hearing executives who understand the needs of the Community and help guide her and the companies to be responsive to those needs for both personal and professional purposes.

Turpin expressed her appreciation for the Chairman's leadership on VRS issues and looks forward to working together to improve services for the Community and the Fund.

Respectfully submitted,

/s/
Gregory Hlibok
Chief Legal Officer
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595 Menlo Drive
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cc: Chairman Pai
Zenji Nakazawa

³ See Letter from Paul C. Besozzi and Benjamin D. Tarbell, Squire Patton Boggs (US) LLP, Counsel to Purple Communications, Inc. to Marlene H. Dortch, Secretary, FCC, in CG Docket Nos. 10-51 & 03-123 (filed Jan. 31, 2017).

⁴ See *FNPRM* at para. 86.

